

13. The answering defendants have absolute immunity from the claims asserted by plaintiff.
14. The answering defendants have qualified immunity from the claims asserted by plaintiff.
15. This court lacks jurisdiction over the parties and/or subject matter of this suit.
16. Plaintiff has failed to present a justiciable case or controversy.
17. The court should not exercise jurisdiction over plaintiff's claims based on the Doctrine of Abstention.
18. Plaintiff has not been deprived of any liberty or property entitlement and therefore plaintiff's claims under 42 U.S.C. § 1983 are barred.
19. There is no pattern, policy, practice or custom of the answering defendant Borough of Berlin Police Department to create liability under § 1983.